



Order Filed on February 18, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

**RAS Citron, LLC**

Authorized Agent for Secured Creditor  
130 Clinton Road, Lobby B, Suite 202  
Fairfield, NJ 07004  
Telephone: 973-575-0707  
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Shauna Deluca, Esq. (SD-8248)

In Re:

**Douglas G. Rodgers,**

**Debtor.**

**Grace A. Rodgers,**

**Joint Debtor.**

Case No.: 18-26037-VFP

Chapter: 13

Hearing Date: January 16, 2020

Judge: Vincent F. Papalia

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby  
ORDERED.

**DATED: February 18, 2020**

A handwritten signature in black ink, appearing to read "Vincent F. Papalia".

Honorable Vincent F. Papalia  
United States Bankruptcy Judge

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Secured Creditor: Nationstar Mortgage LLC d/b/a Mr. Cooper

Secured Creditor's Counsel: RAS Citron, LLC

Debtors' Counsel: Warren D. Levy

Property Involved ("Collateral"): 177 Blvd Blvd, Pompton Plains, NJ 07444

Relief sought:           ■ Motion for relief from the automatic stay

For good cause shown, it is **ORDERED** that Secured Creditor's Motion(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- The Debtor is overdue for 2 months from 12/1/2019 through 1/1/2020.
- The Debtor is overdue for 2 payments from 12/1/2019 through 1/1/2020 at \$2,009.06 per month.

Funds Held In Suspense \$246.95

Total Arrearages Due \$3,771.17

2. Debtor must cure all post-petition arrearages, as follows:

- Beginning on February 1, 2020, regular monthly mortgage payments shall continue to be made directly to Secured Creditor in the amount of \$2,009.06. This amount is subject to change based on escrow and/or interest rate adjustments.
- Beginning on February 15, 2020, monthly cure payments shall be made in the amount of \$628.53 for 5 months, with a 6<sup>th</sup> and final payment in the amount of \$628.52 due on or before July 15, 2020.

3. Payments to the Secured Creditor shall be made to the following address(es):

- Regular monthly payment: Nationstar Mortgage LLC d/b/a Mr. Cooper  
ATTN: Bankruptcy Dept  
PO Box 619094  
Dallas, Texas 75261-9741
- Monthly cure payment: Nationstar Mortgage LLC d/b/a Mr. Cooper  
ATTN: Bankruptcy Dept  
PO Box 619094  
Dallas, Texas 75261-9741

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly mortgage payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and the Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 7 and Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ This agreed order survives any loan modification agreed to and executed during the instant bankruptcy. If any regular mortgage payment due after the execution of a loan modification is more than thirty (30) days late, counsel shall file a Certification of Default with the Court a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.


5. Award of Attorneys' Fees:

- The Applicant is awarded attorney fees of \$350.00 and costs of \$181.00.

The fees and costs are payable:

- Through the Chapter 13 plan.

The undersigned hereby consent to the form and entry of the foregoing order.

  
\_\_\_\_\_  
Warren D. Levy, Esq.  
*Attorney for Debtors*  
Date:

/s/ Shauna Deluca  
\_\_\_\_\_  
Shauna Deluca, Esq.  
*Attorney for Secured Creditor*  
Date: January 30, 2020